

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT,
LOUIS ROBINSON, and MICHAEL LERRO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Civil Action No.: 1:22-cv-05037-AKH

**DECLARATION OF PLAINTIFF
MICHAEL LERRO IN OPPOSITION
TO DEFENDANTS' MOTION TO
AMEND, MAKE ADDITIONAL
FINDINGS, AND AMEND FINAL
JUDGMENT**

I, Michael Lerro, pursuant to 28 U.S.C. Section 1746, hereby declare as follows:

1. My name is Michael Lerro and I am one of the four Lead Plaintiffs appointed by the Court.
2. I submit this declaration in opposition to Defendants' motion for post-judgment relief.
3. After this case was filed in June 2022, I heard about it in the media and contacted Plaintiff's attorney Evan Spencer.
4. I lost approximately \$150,000 trading Dogecoin and I believe that Elon Musk is responsible for my losses.
5. I only invested in Dogecoin due to Elon Musk's tweets and promotions.
6. After he called Doge it "a hustle" on Saturday Night Live it lost 90% of its value and has never bounced back.
7. Over the last two years, Mr. Spencer has been working very hard on this case with his team at his own expense.
8. We have spoken on the phone and communicated by email frequently.

9. Mr. Spencer keeps me up to date on all documents filed with the Court and the status of the case.
10. Recently, I was emailed copies of the Court's order of dismissal and Defendants' motion for sanctions.
11. The Notice of Appeal and confidential email offer of settlement was authorized by me.

I DECLARE UNDER PENALTY OF PERJURY THAT THE
FOREGOING STATEMENT IS TRUE AND CORRECT.

SWORN TO THIS ?? DAY OF OCTOBER, 2024 BY:

/s/Michael Lerro

Michael Lerro
Lead Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th Day of October, 2024, a true and correct copy of the above and foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, giving notice to all parties in this action.

/s/Evan Spencer
Evan Spencer, Esq.